

### **III. REMARKS**

Claims 1-31 are pending in this application. By this amendment, claims 1, 9, 16 and 24 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application.

Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 14, 22 and 30 are objected to for alleged informalities. Claim 16 is rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. Claims 1-31 are rejected under 35 U.S.C. §102(e) as allegedly being unpatentable over Gorelik (U.S. Patent Pub. No.2005/0055369), hereafter “Gorelik.”

#### **A. OBJECTION TO CLAIMS 1, 14, 22 AND 30 FOR INFORMALITIES**

The Office has objected to claims 1, 14, 22 and 30 for alleged informalities. For example, the Office objects to the limitation “a number unique of matching processes.” Applicants have amended claim 1 to cure the alleged informality. Further, the Office states that it is unclear to which matching resource in claims 9, 16 and 24 are referred to in claims 14, 22 and 30. Applicants respectfully disagree and submit that it is clear the “the matching resource” of the dependent claims depend from the limitation “a matching resource” of the independent claims and not from the limitation “an external matching resource.” Accordingly, Applicants respectfully request that the rejection be withdrawn.

## **B. REJECTION OF CLAIM 16 UNDER 35 U.S.C. §101**

The Office has rejected claim 16 under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. Specifically, the Office states that the claim can be construed as software per se. Applicants have amended claim 16 to include a processor and a memory to comport with the Office's definition of statutory subject matter. Accordingly, Applicants request that the rejection be withdrawn.

## **C. REJECTION OF CLAIMS 1-31 UNDER 35 U.S.C. §102 OVER GORELIK**

With regard to the Office's rejection under 35 U.S.C. §102, Applicants assert that Gorelik does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 9, 16 and 24, Applicants submit that Gorelik fails to teach matching by performing a number of types of matching processes in sequence until a match is found. The Office equates this feature with a single search that returned five matches between unique values. However, Gorelik that the five matches were returned from different types of searches. To this extent, Gorelik does not teach a number of unique types of matching processes performed in sequence until a match is found. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants

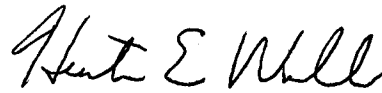
respectfully request withdrawal of this rejection.

#### IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. These features have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that the claimed subject matter is in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



Hunter E. Webb  
Reg. No.: 54,593

Date: August 14, 2007

Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14th Floor  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)

RAD/hew